UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CHRISTOPHER JAMES WALKER, on behalf of himself and all others similarly situated,
 	
           Plaintiff,
 	
v.
 	
HIGHMARK BCBSD HEALTH OPTIONS, INC.; COTIVITI, INC.,
 	
           Defendants.
	Civil Case No.: 20-cv-1975
	Hon. Christy Criswell Wiegand

**NOTICE OF STIPULATION OF EXTENSION TO
FILE RESPONSE TO COMPLAINT PURSUANT TO LOCAL RULE 7.E**

The parties, by and through their undersigned attorneys, respectfully submit this Notice of Stipulation of Extension to File Response to Complaint Pursuant to Local Rule 7.E:

1.   Plaintiff Christopher James Walker ("Plaintiff") filed the Complaint against Defendant Highmark BCBSD Health Options, Inc. ("Highmark") in the Court of Common Pleas of Allegheny County, Pennsylvania on November 30, 2020. (Dkt. 1.) Highmark removed the action to this Court on December 21, 2020. (*Id.*)

2.   On August 5, 2021, Plaintiff filed a First Amended Complaint ("FAC") against Highmark. (Dkt. 38.)

3.   On November 29, 2021, Plaintiff filed a motion to amend the FAC to name Cotiviti, Inc. ("Cotiviti") as a defendant. (Dkt. 65.)

4.   On December 1, 2021, the Court granted Plaintiff's motion to amend. (Dkt. 68.) On the same day, Plaintiff filed a Second Amended Complaint ("SAC") against Highmark and Cotiviti. (Dkt. 71.)

5.   Plaintiff served Cotiviti with the SAC on December 8, 2021.

6.   The parties hereby stipulate that the time for Cotiviti to respond to the SAC will be extended by 30 days, from December 29, 2021, to January 28, 2022. By agreeing to this stipulation, Cotiviti does not waive any defenses or objections it has to Plaintiff's Complaint.

7.   Rule 7.E of the Local Civil Rules for the United States District Court for the Western District of Pennsylvania provides that the parties may file a stipulation for an extension of the deadline for the filing of an Answer one time without the Court's approval for a period not exceeding 45 days from the due date.

8.   Accordingly, the parties respectfully submit this Notice of Stipulation of Extension to File a Response Pursuant to Local Rule 7.E to inform the Court of the extension for the filing of Cotiviti's response to the Plaintiff's SAC until January 28, 2022.

<div align="center">STIPULATION AND AGREED TO BY:</div>

/s/ Jeremy M. Glapion	*/s/ Mark A. Grace*
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Attorneys for Plaintiff Christopher James Walker   *Attorneys for Defendant Cotiviti, Inc.*

Dated: January 12, 2022

<u>CERTIFICATE OF SERVICE</u>

I certify that on January 12, 2022, a true and correct copy of the foregoing Notice of

Stipulation of Extension to File Response to Complaint Pursuant to Local Rule 7.E was filed

electronically and notice of filing was sent to all parties by operation of the Court's CM/ECF

system, which will send notification of such filing to the following:

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Respectfully submitted,

/s/ Mark A. Grace
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